

Akin Gump

Strauss Hauer & Feld LLP

SARAH LINK SCHULTZ
+1 214.969.4367/fax: +1 214.969.4343
sschultz@akingump.com

May 10, 2013

VIA HAND DELIVERY

Judge George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAY 13 2013

Re: *In re TerreStar Corporation, et al., Aldo Ismael Perez v. TerreStar Corporation, et al.* (13-cv-00562-GBD)

Dear Judge Daniels:

We are counsel to the appellees in the above-referenced matter, debtors and debtors-in-possession, TerreStar Corporation, *et al.* (the “TerreStar Debtors” or the “Appellees”). The chapter 11 proceeding is currently pending in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). (Case No. 11-10612.) We write to request an enlargement of time to file the TerreStar Debtors’ appellee brief in the above-captioned appeal.

This appeal was docketed on January 25, 2013, and Appellant’s opening brief was initially due on March 5, 2013, pursuant to the Court’s scheduling order. [Docket No. 3.] Following several extensions of the deadline, Appellant filed his opening brief on May 3. The TerreStar Debtors’ appellee brief is due on May 17, 2013, pursuant to Federal Rule of Bankruptcy Procedure 8009(a)(2).

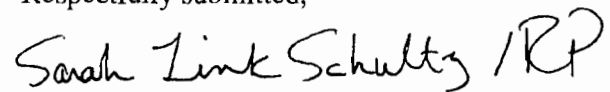
On April 22, 2013, Appellant filed an adversary proceeding complaint in the Bankruptcy Court against the TerreStar Debtors, seeking revocation of the confirmation order currently on appeal in this matter. On April 24, 2013, Judge Abrams, of this Court, dismissed Appellant’s appeal of the Bankruptcy Court’s denial of his motion seeking appointment of an examiner; on May 8, 2013, Appellant filed a motion seeking reconsideration of that dismissal. [1:12-cv-00857-RA, Docket Nos. 35, 36.]

Due to commitments of TerreStar Debtors’ counsel in other cases, as well as the need to respond to Appellant’s adversary proceeding complaint and motion for reconsideration, the

Judge George B. Daniels
May 10, 2013
Page 2

TerreStar Debtors are seeking an extension of 30 days, to June 17, 2013, to file their appellee brief, with Appellant's reply brief due on July 1, pursuant to Federal Rule of Bankruptcy Procedure 8009(a)(2). Appellants have sought and received Appellee's consent to this request for an extension. This is the TerreStar Debtors' first request for an enlargement of time in this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Sarah Link Schultz / RP". The signature is written in a cursive, flowing style.

Sarah Link Schultz

cc: Juan Zorilla, Esq.